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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 16-CR-00334 LHK
)	CASE NO. 16-CR-00335 LHK
Plaintiff,)	
)	
v.)	JOINT STIPULATION REGARDING SELF-
)	SURRENDER DATE; PROPOSED ORDER
JENNIFER YANG & DANIEL WU,)	
)	
Defendants.)	

The United States and Defendants Jennifer Yang and Daniel Wu, by and through their counsel, stipulate and agree that the Court should set a self-surrender date of August 7, 2023 for the Defendants in this case.

On December 19, 2019, Defendants Jennifer Yang and Daniel Wu were convicted of: (1) Visa Fraud; (2) Mail Fraud; and (3) Conspiracy to Commit Visa Fraud, Mail Fraud, and Aggravated Identity Theft. ECF No. 344.

On August 19, 2020, the Honorable Lucy H. Koh sentenced Defendant Jennifer Yang to 46 months imprisonment on each of the four counts of conviction, to be served concurrently and followed by three years of supervised release. ECF No. 413. Defendant Daniel Wu was sentenced that same date

1 to 24 months of imprisonment on each of the four counts of conviction, to be served concurrently and
 2 followed by three years of supervised release. *Id.* Both Defendants were ordered to self-surrender to
 3 their designated facility by February 3, 2021. *Id.*

4 On January 5, 2021, Judge Koh granted Defendants' Motions for Bail Pending Appeal. ECF
 5 Nos. 473, 474.

6 On October 18, 2022 the Ninth Circuit issued the Mandate as to Defendants' appeals, affirming
 7 the District Court's judgment and putting it into effect as of that date. ECF No. 484. Because the self-
 8 surrender date originally set by the Court was preempted by the Court's granting of Defendants'
 9 Motions for Bail Pending Appeal, it is necessary to set a new self-surrender date for each Defendant.

10 Accordingly, the parties herby stipulate and agree that each Defendant shall surrender for service
 11 of sentence at the institution designated for them by the Bureau of Prisons by 2:00 p.m. on August 7,
 12 2023.

13
 14 DATED: June 20, 2023

Respectfully submitted,

15 ISMAIL J. RAMSEY
 16 United States Attorney

17 /s/ John C. Bostic
 18 JOHN C. BOSTIC
 19 Assistant United States Attorney

20
 21 DATED: June 20, 2023

/s/ Mark Flanagan
 22 MARK FLANAGAN
 23 BENJAMIN CONERY
 24 NAOMI CHUNG
 25 Counsel for Defendant Jennifer Yang

26 DATED: June 20, 2023

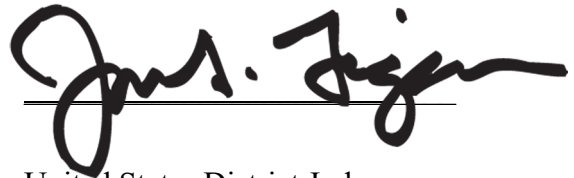
/s/ Alyssa Bell
 27 ALYSSA BELL
 28 Counsel for Defendant Daniel Wu

~~[PROPOSED]~~ ORDER

Having considered the stipulation of the parties, the Court hereby ORDERS that Defendants Jennifer Yang shall surrender for service of sentence at the institution designated for her by the Bureau of Prisons by 2:00 p.m. on August 7, 2023. Defendant Daniel Wu shall surrender for service of sentence at the institution designated for him by the Bureau of Prisons by 2:00 p.m. on August 7, 2023

IT IS SO ORDERED.

DATED: June 21, 2023


United States District Judge